EXHIBIT D



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December 5, 2019

BY EMAIL(W/O ENCLOSURE) AND HAND DELIVERY

Emma Lerner Freeman, Esq. Attorney for Plaintiffs
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New York, NY 10020

Re: <u>Clark, et al. v. The City of New York</u>, 18-CV-2334 (RWS)(KHP)

Counsel:

Please find enclosed a CD, bearing Bates Stamp NYC CD 3, containing a spreadsheet with the results of defendant's searches of the New York City Police Department's zOLPA forms. The spreadsheet contains a list of the arrest number for each arrest where it was documented that the arrestee was wearing head gear described using one of search terms previously agreed upon search terms, between March 1, 2014 and March 31, 2018. Note that the head gear type of each arrestee is indicated on the spreadsheet.

According to defendant's analysis, eighteen of these arrest numbers are duplicative of arrest numbers that were previously produced as a result of the Omniform Arrest and Complaint reports keyword search.

The enclosed spreadsheet is deemed <u>"Attorneys' Eyes Only"</u> pursuant to the Unsealing Order endorsed by the Court on October 16, 2019. For security purposes, this spreadsheet is password protected. The password is:

Sincerely,

Bilal Haider Senior Counsel

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